

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TIMOTHY J. GOLDEN,

Plaintiff,

-against-

VERIZON,

Defendant.

Civil Action 1:22-cv-05757 (RA)(JEW)

**DEFENDANT'S NOTICE OF MOTION
TO DISMISS THE COMPLAINT OF
PLAINTIFF TIMOTHY J. GOLDEN**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law in Support of Defendant Verizon New York Inc.'s Motion to Dismiss the Complaint, the accompanying Declaration of Valerie Fasolo, with exhibit, and the accompanying Declaration of Devjani H. Mishra, Esq., with exhibits, and all prior pleadings and proceedings herein, Defendant, by and through its attorneys, Littler Mendelson, P.C., will move this Court, before the Honorable Ronnie Abrams, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, on a date and time to be designated by the Court, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing Plaintiff's Complaint, and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 4A of this Court's January 4, 2016 Special Rules & Practices in Civil *Pro Se* Cases, the Plaintiff shall file and serve any papers in opposition to Defendant's Motion to Dismiss on or before July 7, 2023 and Defendant shall file and serve its reply papers on or before July 21, 2023.

Dated: New York, New York
June 9, 2023

/s/ Devjani H. Mishra

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